

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States Securities and
Exchange Commission,

Case No: Civ. No. 21-1932 (DSD/TNL)

Plaintiff,

v.

Jason D. Bullard, Angela
Romero-Bullard, and
Bullard Enterprises, LLC, FORMS;

Defendants,

DLJ Real Estate LLC,
Empire Investments LLC,
Empire Racing Stables, LLC, and
TI 13LLC,

Relief Defendants,

Nauni Manty,

Receiver.

RECEIVER'S MOTION TO APPROVE SETTLEMENT AGREEMENT

Nauni Manty, in her capacity as the court-appointed Receiver ("Receiver") of the above-captioned Defendants and Relief Defendants, respectfully files this motion to approve a settlement agreement and release (the "Motion") between the Receiver and Defendants Jason Bullard and Angela Romero-Bullard. The Receiver has provided a copy of the Settlement Agreement to the SEC and has been informed that it has no concerns regarding the agreement.

This Motion is supported by (1) an accompanying Memorandum of Law, (2) the Declaration of Nauni Manty, the Receiver, (3) arguments of counsel, (4) the pleadings and papers on file in this action, and (4) such other evidence and argument as may be presented to the Court before or at the time of the hearing.

Dated: June 8, 2023

MANTY & ASSOCIATES, P.A.

/s/ Jeffrey D. Smith

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